

MARITIME MOBILE SERVICE IDENTITIES COMMENTS

WT Docket No. 07-230

Thursday, October 18, 2007

COMMENTS

In our modern world there is no reason to operate independent databases for life critical information. The reason the process is failing is failure to synchronize the GMDSS Task Force database(s), the FCC database, and, I suspect the USCG database. We are long past the time when organizations can duck responsibility by claiming that databases cannot be connected.

I am the guy out there in the perfect storm with 2 MMSI's floating around in the international rescue systems. I don't care about "running out of numbers" or other beauracratc facing saving excuses: if the USCG uses the wrong database field, I am dead!

Also the current issuance of numbers by GMDSS Task Force does not tell the applicant that he/she already has a MMSI if they have a station license. And the station license does not use the phrase "MMSI" anywhere, nor do FCC website pages explain that MMSI and "Ship Station Identity" are the same.

As part of any decision-making on this subject, I believe all parties should conduct a process analysis. This analysis should have a single goal: make sure lives are saved. The process analysis should ask how many databases are used in the process, which ones are connected, and most importantly, how can a single database be accessed by all parties. The process should extend to the desired end point: the crew and passengers safely ashore. The parties on the process team should include the people who care the most: the crews and passengers. A process team without these folks will not have the "survival instinct" to reach the goal! The process team may want to ask a couple simple questions:

1. Why are multiple organizations in this loop? The end users can get a number from any computer, why have multiple operators?

2. How many roadblocks do we want to put between the sinking ship and the rescue agency? Every separate support system is a potential delay or a human error waiting to happen. How many persons will give up in desperation before they get an MMSI into that new VHF?
3. What about our international friends who can mount DSC rescue responses? Does our database connect directly to their command screen? Thousands of Americans spend there summers in Canadian waters, and winters in our southerly neighbors waters.
4. How many numbers can we layer on a single vessel? Count the number sets on a Ship Radio Station Authorization. Should we be heading to a universal ID for a vessel, the owner operator, and all equipment on board? Remember, every number set is another question on the radio or on the form... where is the value?
5. How are these processes connected to hardware related activities? Why limit the number of times you can change the VHF MMSI settings? Can the vessels "universal" number be transmitted to the radio at start up?
6. How many manual transcriptions of the MMSI number occur during a SAR? Every one of those is a life threatening action. Can they be reduced?

It is a challenge, but there are plenty of good thinkers involved. This can be fixed! And in the process, we may find ways to improve other connecting processes.

Good Luck To Us All!

Ron Parypa